

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

DEREK TUCSON, ROBIN SNYDER,
MONSIEREE DE CASTRO, and ERIK
MOYA-DELGADO,

Plaintiffs,

v.

CITY OF SEATTLE, ALEXANDER
PATTON, TRAVIS JORDAN, DYLAN
NELSON, JOHN DOES (#1-4), and JANE
DOES (#1-2)

Defendants.

No. 2:23-cv-00017-MJP

PLAINTIFFS' MOTION TO FILE
SUPPLEMENTAL COMPLAINT UNDER
Fed. R. Civ. P. 15(d)

Note for Motion: April 14, 2023

PLAINTIFF respectfully requests permission to file the attached Supplemental Complaint, setting forth "event[s] that happened after the date of the pleading to be supplemented," pursuant to Fed. R. Civ. P. 15(d). This motion is supported by the Declaration of Nathaniel Flack in Support of Plaintiffs' Motion To File Supplemental Complaint ("Flack Decl."). The Supplemental Complaint addresses the City's partial legislative amendment to SMC 12A.08.020, initiated after the Complaint was filed, and in response to this litigation. *See* Flack Decl. at ¶ 2; Exhibits 2 and 3 to Flack Decl. at ¶¶4.35-4.36. The supplemental Complaint sets forth the content of the amendment, the text of the amended ordinance, and aspects of the legislative record relevant to Plaintiff's claims and relief. *Id.*

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1 DATED this 23rd day of March, 2023.

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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following individuals:

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DATED this 23rd day of March, 2023, at Seattle, Washington.

s/ Lucas Wildner
Lucas Wildner